

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:

Henry Bedford aka Andrei Losev dba Hot Rod
Motors and Lars Group, Inc.

Debtor(s).

CHAPTER 13

CASE NO.: 19-16254-amc

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC d/b/a Shellpoint Mortgage Servicing (“NewRez”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esq.
Hill Wallack LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034
Telephone: 856-616-8086
Facsimile: 856-616-8081
Email: apattison@hillwallack.com

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive

NewRez LLC d/b/a Shellpoint Mortgage Servicing (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez LLC d/b/a Shellpoint Mortgage Servicing is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 12, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.

Hill Wallack LLP

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Cherry Hill, NJ 08034

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Counsel to NewRez LLC d/b/a Shellpoint Mortgage Servicing

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for Newrez LLC d/b/a/ Shellpoint Mortgage Servicing in the manner indicated below on April 12, 2024:

Henry Bedford
66 Carmelita Drive
Richboro, PA 18954

Debtor

Via Regular Mail

Michael I. Assad
Cibik Law, P.C.
1500 Walnut St
Ste 900
Philadelphia, PA 19102
Counsel for Debtor
Via ECF

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Trustee

Office of the U.S. Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107
United States Trustee
Via ECF

By: /s/ Angela C. Pattison
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